

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF TEXAS  
SHERMAN DIVISION**

IMPERIUM IP HOLDINGS (CAYMAN), LTD., )  
 )  
 Plaintiff and Counterclaim Defendant, )  
 )  
 v. ) **JURY TRIAL DEMANDED**  
 )  
 SAMSUNG ELECTRONICS CO., LTD., )  
 SAMSUNG ELECTRONICS AMERICA, INC., )  
 SAMSUNG TELECOMMUNICATIONS )  
 AMERICA, LLC, AND SAMSUNG )  
 SEMICONDUCTOR, INC., )  
 )  
 Defendants and Counterclaim Plaintiffs. )

**DEFENDANTS' NOTICE OF COLLATERAL PROCEEDING  
PURSUANT TO LOCAL RULE 42(A)**

Defendants Samsung Electronics Co., Ltd., Samsung Electronics America, Inc., and Samsung Semiconductor, Inc. (collectively, “Samsung”) hereby provide notice that on November 16, 2015, in the District of Delaware, Defendants filed a complaint against plaintiff Imperium IP Holdings (Cayman), Ltd. for breach of contract (Civil Action No. 15-1059).

Dated: November 23, 2015

Respectfully submitted,

/s/ *Steven Pepe*  
By: (with permission by John F. Bufe)

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Co., Samsung Electronics America, Inc., and  
Samsung Semiconductor, Inc.*

**CERTIFICATE OF SERVICE**

I hereby certify that on November 23, 2015, the foregoing document was filed electronically in compliance with Local Rule CV-5(a) and thereby served upon counsel of record.

By: *John F. Bufo*  
JOHN F. BUFE